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8 UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF WASHINGTON

10 RAMON TORRES HERNANDES, and  
11 FAMILIAS UNIDAS POR LA  
12 JUSTICIA, AFL-CIO, a labor  
organization,

Plaintiffs,

13 v.  
14

15 UNITED STATES DEPARTMENT OF  
LABOR and MILTON AL STEWART,  
16 in his official capacity as United States  
Secretary of Labor,

17 Defendants.

No. 1:20-CV-03241-SMJ

MOTION TO EXPEDITE

02/24/21

Without Oral Argument

18 The United States Department of Labor Defendants, through counsel, submit the  
19 following motion to expedite consideration of their Motion to Take Judicial Notice  
20 filed at ECF No. 54. Plaintiffs do not oppose the motion.  
21

22 Expedited consideration of the motion is necessary because the subject of the  
23 motion, the 2021 Adverse Effect Wage Rates (“AEWRs”) that took effect yesterday,  
24 may be pertinent to the Court’s forthcoming ruling on Plaintiffs’ Revised Motion for  
25 Preliminary Injunction.  
26  
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1 DATED this 24th day of February, 2021.

2 William D. Hyslop  
3 United States Attorney

4 s/ John T. Drake  
5 John T. Drake  
6 Jessica A. Pilgrim  
7 Assistant United States Attorneys  
8 *Attorneys for U.S. DOL Defendants*  
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**CERTIFICATE OF SERVICE**

I hereby certify that on February 24, 2021, I caused to be delivered via the method listed below the document to which this Certificate of Service is attached (plus any exhibits and/or attachments) to the following:

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Kathleen Phair Barnard BARNARD IGLITZIN & LAVITT, LLP 18 West Mercer Street, Suite 400 Seattle, WA 98119	<input checked="" type="checkbox"/> CM/ECF System <input type="checkbox"/> Electronic Mail <input type="checkbox"/> U.S. Mail <input type="checkbox"/> Other: _____

s/John T. Drake

John T. Drake